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Amdt. dated June 26, 2007
Reply to Office action of April 09, 2007

REMARKS

Request for Continued Examination

Applicant respectfully requests continued examination of the above-indicated application as per 37 CFR 1.114.

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Claims 1, 5-6, 9-10, 14-18, 20-21, 23-25 are rejected under 35 USC 102e as being anticipated by Lee, US Patent Application Publication No. 2004/0054745

Applicant has amended independent claim 1 to include the feature, "the interface module is stored in a first storage device of the mobile unit by a manufacturer of the mobile

10   unit, and the language information module and the font database are stored in different storage device(s) of the mobile unit by the manufacturer of the mobile unit". A similar amendment is made to independent claim 10. Independent claim 18 is amended to include the feature, "the language information module and the font database are stored by a manufacturer of the mobile unit in different storage device(s) than a user interface module of

15   the mobile unit". A similar amendment is made to independent claim 21. Antecedent basis issues caused by this amendment and previously in error are also corrected throughout the claims.

No new matter is entered by the above amendments. For example, paragraph [39] of the specification as originally filed states:

20   "Therefore, the multi-language system contains the interface module, the language information module and the font database according to the present invention, wherein the interface module, the language information module and the font database can be stored in different storage devices. In another condition, the language information module and the font database are stored in a storage

25   device and the interface module is stored in another storage device. In the two above-mentioned conditions, the language information module and the interface module are independent, which is the desired goal." (paragraph [39] – emphasis added)

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Additionally, paragraph [38] of the specification as originally filed states:

"In summary, when a manufacturer wants to insert or delete a natural language into or from the multi-language system 30, without modifying the interface module 32 and the user interface provided by it (a MMI), a manufacturer just needs to adjust the contents of the language information module 50 and the font database 45 to easily insert or delete a natural language into or from the multi-language system 30." (paragraph 38 – emphasis added)

Concerning the patentability of currently amended independent claims 1, 10, 18, and 21, applicant notes that in the rejection of original claims 7 and 8, the Examiner stated in the Office action dated 04/09/2007 that Lee "does not explicitly teach storing the language module, interface module, and font set into separate storage areas." However, the Examiner then continues by rejecting claims 7 and 8 under 35 USC 103(a) as being obvious stating, "... it was commonly known to those of ordinary skill in the art and would have been obvious at the time the invention was made to a person having ordinary skill in the art to store data into separate storage areas for the motivational purpose of maximizing compatibility, portability, space and time and minimizing anomalies."

Firstly, the applicant respectfully disagrees with the Examiner's that it would be obvious to one skilled in the art to store the language module, interface module, and font set into different storage devices. (Note: applicant claimed different storage devices, not separate storage areas which are not the same thing as different physical devices.) In fact, it is a well known industry goal to reduce the number of different components utilized in consumer electronic devices. The motivation behind consolidating components in consumer electronic devices includes maximizing compatibility (i.e., reducing compatibility problems between different components), portability (i.e., reducing components to thereby utilize less power and run longer on batteries), space and time (i.e., reducing components to shrink size and increase clock speeds) and minimizing anomalies (i.e, reducing unwanted interactions and interference between different components). That is, all the reasons cited by the Examiner for why it

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would be obvious to use different storage devices in Lee are in fact reasons to not use different storage devices.

　　　　Secondly, applicant would like to point out a difference between the teachings of Lee and the present invention as claimed in currently amended claims 1, 10, 18, and 21 -- namely

5　　that the disclosure of Lee is directed at allowing consumers (i.e., users of the mobile communication terminal) to change languages, while the present invention is directed at facilitating language storage and changes done by the manufacturer of the mobile unit before consumers begin using the device. For example, see paragraph [0045] of Lee stating, "According to the present invention, it is possible for a mobile communication terminal to

10　　flexibly support multiple languages by downloading only languages desired by a user of the mobile communication terminal and displaying menu and message of the mobile communication terminal on a display window in the desired language and font. Accordingly, the user can lease a local mobile communication terminal in a foreign country and use the mobile communication terminal in the desired language." This is in contrast to currently

15　　amended claims 1, 10, 18, and 21 claiming that the various language modules are stored by the manufacturer of the mobile unit.

　　　　In regards to the various language modules being stored by the manufacturer, because the present invention is directed language selection by the manufacturer and not by the user of the device, it is actually a benefit of the present invention to store the user interface module in

20　　a different storage device than the language information module and font database. One example of why this is a benefit is that the manufacturer can simply modify the storage devices containing the language information module and font database in the event of a language change. In another example, a particular model of mobile phone to be sold in a first target market and another model to be sold in a second target market could have all the same

25　　physical parts except for the storage device(s) containing the language information module and font database. Such benefits are disclosed in paragraph [39] of the present invention stating, "In the multi-language system according to the claimed invention, the language information module and the interface module are independent, so products using the

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multi-language system are easily customized, which means when a manufacturer produces
the products, a specific natural language can be inserted or deleted into or from the products
according to market needs, which means inserting, deleting, or modifying a language
information set and font set(s) corresponding to a natural language into or from the products.

5   Therefore, the products of different natural languages can be quickly provided to the market."

In summary, applicant asserts that currently amended independent claims 1, 10, 18, and
21 should be found allowable with respect to the teachings of Lee for at least the following
reasons:

10   1. It would not be obvious to modify the teachings of Lee to store the language
               module, interface module, and font set into different storage devices because this
               would reduce compatibility, reduce portability, increase space and time and
               increase anomalies.

            2. Lee does not disclose or suggest the interface module is stored in a first storage
15   device of the mobile unit by a manufacturer of the mobile unit, and the language
               information module and the font database are stored in a different storage device(s)
               of the mobile unit by the manufacturer of the mobile unit. (claims 1 and 10 –
               emphasis added)

            3. Lee does not disclose or suggest the language information module and the font
20   database are stored by a manufacturer of the mobile unit in a different storage
               device than a user interface module of the mobile unit. (claims 18 and 21 –
               emphasis added)

Reconsideration of claims 1, 10, 18, and 21 is respectfully requested. Claims 5-9 and
25   14-17 are dependent upon claims 1 and 10, respectfully, and should also be found allowable
for at least the same reason. Similarly, claims 20 and 23 are dependent upon claims 18 and 21,
respectfully, and should also be found allowable for at least the same reason.

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Claims 7 and 8 are rejected under 35 USC 103a as being unpatentable over Lee, US Patent Application Publication No. 2004/0054745

As previously mentioned, claims 7 and 8 are dependent upon base claim 1, which is believed allowable over the cited reference of Lee for at least the above stated reason. For at

5   least this reason, combined with the above described arguments against the motivation utilized by the Examiner in the rejections of claims 7 and 8:

- It would not be obvious to modify the teachings of Lee to store the language module, interface module, and font set into different storage devices because this would reduce compatibility, reduce portability, increase space and time and

10   increase anomalies.

Therefore, applicant asserts that dependent claims 7 and 8 should not be found rejected under 35 USC 103a as being unpatentable over the teachings of Lee. Reconsideration of claims 7 and 8 is respectfully requested.

15   **New Claims**

New claims 25, 26, 27, and 29 are added being dependent upon claims 1, 10, 18, and 21, respectively. No new matter is entered. In particular, see paragraph [39] of the present invention as originally filed stating that the manufacturer inserts and deletes natural languages into or from the multi-language system, and that this allows the manufacturer to customize

20   products (such as a mobile phone) and quickly provide them to the market.

Concerning the patentability of new claims 25-29, applicant firstly points out that claims 25, 26, 27, and 29 are added being dependent upon claims 1, 10, 18, and 21, respectively; and therefore, should be allowable for at least the same reasons stated above for the independent claims. Additionally, applicant points out that Lee does not teach the manufacturer storing the

25   languages (or inserting or deleting a specific natural language) of the mobile unit within the mobile unit before providing the mobile phone to the market. Instead, Lee teaches users selecting and downloading new languages while utilizing the device during normal use. For at least this reason, applicant asserts that claims 25-29 should be found allowable with respect
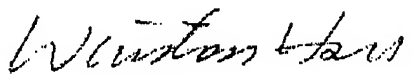
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to the teachings of Lee.

Conclusion:

5   Thus, all pending claims are submitted to be in condition for allowance with respect to the cited art for at least the reasons presented above. The Examiner is encouraged to telephone the undersigned if there are informalities that can be resolved in a phone conversation, or if the Examiner has any ideas or suggestions for further advancing the prosecution of this case.

10   Sincerely yours,

Date: _____06.26.2007_____

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20   is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan.)

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